#### . STATE OF KANSAS



## DEPARTMENT OF HEALTH AND ENVIRONMENT Forbes Field

Topeka, Kansas 66620-0001 Phone (913) 296-1500

Mike Hayden, Governor

Stanley C. Grant, Ph.D., Secretary Gary K. Hulett, Ph.D., Under Secretary

#### RCRA COMPLIANCE INSPECTION REPORT GENERATORS AND TRANSPORTERS CHECKLIST

262.11	A.	<u>General</u>				
		Date March 1, 19	989Time1000	hrs. EPA ID No.	KSD000203638	
		Facility Name_Ol:	in Water Services			
		Street 3155 Fiber	glass Road			
		City Kansas City		, Kansas Z	ip_66115	
		County_Wyandotte		Phone 913-621-64	40	
		Contacts William	Dame - Plant Manage	er Larry Prouty -	Environmental Officer	Affairs
		Inspector Jim F	ishcer			
		Other Thomas Vitt	titow and Rakesh Moha	n Legislative Post	Audit Staff	
	В.	Hazardous Waste I	Determination			
262.11		261.32, or 26 If yes, list	tor generate waste 51.33? t waste(s), EPA Hazar ubpart D, and quantit	dous Waste No. acco	SCO 16 0 3000 •0	YES NO
		EPA Hazardous	Describe Waste Mataerial	Quantity/Month	Method of Disposal	
		U031 U070 U133	N-butyl Alcohol O-Dichlorobenzene Hydrazine	Varies/attempt  js made to	No shipment in 1988 or	
		U242	Pentachlorophenol	Rework Materials If not reworkable it is moved to	to date in 1989	

Continued on 2nd page .....

R00146068
RCRA RECORDS CENTER

#### Continuation of 1st page . ...

EPA Hazardous Waste No.	Describe Waste Material	Quantity/Month	Method of Disposal	
F001	Methylene Chloride	Varies/Lab Waste	Pick up by Safety-Kleen Corporation	

2. Does generator generate waste(s), not listed, that exhibit hazardous characteristics (corrosivity, ignitability, reactivity, EP toxicity)?

YES NO

a. If yes, list waste(s), EPA Hazardous Waste No. according to 40 CFR, Subpart C, and quantity.

EPA Hazardous Waste No.	Waste Material	Quantity/Month	Method of Disposal
D001	Lab Solvents	Varies	Safety-Kleen Corporation
D002			
D003	и и и		
D007	11 11 11		
D009	Mercury	Not generated on regular basis	Chemical Waste Management

		ŀ	0.	Does generator determine characteristics by testing by applying knowledge of processes? Explain below:	or		
· «.				<ol> <li>If determined by testing, did generator use test method 261.21, 261.22, 261.23, or 261.24 or was equivalent test method used?</li> </ol>	YE9	юм	NA
31 38.J				a. If equivalent method used, obtain copy of test method.			
		3. /	Are	there any other wastes generated by generator?	YES	NO	٧.
		;	a.	If yes, list below:			1
		i.		Waste Description Method of Disp	oosal	*	
				REGULAR TRASH  BFILOCAL PI SANITARY LAN		ED	
			b.	Did the generator test these wastes to determine if hazardous?	YES	МО	(N/
a				Explain if necessary:			
. 1100 					•		
		4.	Gen	erator size classification:	v .		
			a.	Does firm generate less than 75 kg of hazardous waste per month (Small quantity generator)?	YES	NO	
			b.	Does firm generate 75 kg or more but less than 1,000 kg. of hazardous waste per month (Kansas generator)?	YES	NO	)
	- 2		c.	Does firm generate more than 1,000 kg of hazardous waste per month (EPA generator)?	YES	`NC	)
**************************************				T/S/D FACILITY (STORAGE)			
Haz	ardous waste	determ	nina	tion requirements:			
Maz.	Adequa			Inadequate			• ;
	4.30						-
	If generate less than			es less than 100 kg. of hazardous waste per month or stop here.	accum	nula	tes
.,	Special Control			· 1.24.4			

· .		_					
	1.	Doe	es g	rator ship waste off-site?	YES	NO	
262.21		a.	If	yes, does manifest include:	$\sim$	×	
*			1.	Manifest document number?	(YES)	NO	
			2.	Generator's name, address, phone number, and EPA ID number?	YES	NO	
			3.	Name and EPA ID number of each transporter?	YES	МО	
			4.	Name, address, and EPA ID number of designated facility?	YES	NO	
			5.	Name, address, and EPA ID number of alternate facility if any. (The generator may also provide instructions to return waste to generator if undeliverable)?	YES	Ю	NA
			6.	Waste information required by DOT-Shipping name, (49 CFR 172.101, 172.202, 172.203) total quantity, type and number of containers?	YES	NO	
			7.	Certification information - "This is to certify that the above named materials are properly claified, described, packaged, marked, and labeled and are in proper condition for transportation according to applicable regulations of DOT and EPA"?	ss-	NO	
262.23		b.		s generator retain copies of manifest? yes, complete 1 through 4.	YES	NO	
			1.	Does generator sign and date all manifests by hand?	YES	NO	NA
			2.	Does generator obtain handwritten signature and date of acceptance from initial transporter?	YES	) NO	NA
			3.	Does generator retain copy of manifest signed by both generator and transporter?	YES	NO	NA
262.40			4.	Does generator retain copy of manifest signed and dated by T/S/D facility owner/operator for three years?	VES	NΩ	NΔ

Adequate [ ] Inadequate

	D.	Pre	e-Transport Requirements		
	262.30	1.	Does generator package waste in accordance with DOT requirements (49 CFR 173, 178, and 179)?	(YES)	NO
	262.31	2.	Does generator label each package in accordance with DOT requirements (49 CFR 172)?	YES	NO
	262.32	3.	Does generator mark each package in accordance with DOT requirements (49 CFR 172)?	YES	NO
		4.	Does generator mark each container of 110 gallons or less as below:	YES	NO
	·		Hazardous Waste - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. E.P.A. Generator's Name and Address		
			Manifest Document Number_		
	262.33	5.	Does generator have placards to offer to transporters (49 CFR 172, Subpart F)?	YES	мо (
Pre-	transport requ	uirem	ments:	***************************************	
			[ ] Inadequate		
	Ę.	Red	cord Keeping and Reporting		
	262.40	1.	Does generator keep a copy of completed manifests from designated facilities for three years?	YES	NO
		2.	Does generator keep a copy of each Annual Report and Exception Report for three years?	YES	МО
		3.	Does generator keep records of test results and waste analyses used in determining hazardous or non-hazardous nature of wastes for three years?	YES	NO
Rec	ord keeping an	d re	porting requirements:		
.,			[] Inadequate	3	and the second second
	F.	Sp	ecial Conditions		
		1.	Has generator received from or transported to a foreign source any hazardous waste?	YES	(NO)

	b. s waste manifested and signe foreign cosignee?	YES NO NA
	c. If generator transports wastes out of the country, has confirmation of delivered shipment been received?	YES NO NA
	٠	
Special conditions	s requirements:	9
[ ] Adequate	[] Inadequate MA	
G.	Accumulation Time	
262.34	<ol> <li>Does generator temporarily store waste before trans- port for 90 days or less?</li> </ol>	YES NO NA

152

YES NO NA

NO NA

Regional Administrator?

G. Accumu	ulation	n Time			
		nerator temporarily store waste before trans- 90 days or less?	YES	NO	NA
a.	. If y	ves, is waste placed in containers?	YES	МО	NA
	If y	es,			
	1.	Check overall condition of containers.			
265.173	2.	Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste?	(YES)	NO	N/
265.174	3.	Does owner/operator inspect areas where containers are stored, at least weekly, for signs of leakage and/or deterioration caused by corrosion or other factors?	(YES)	NO	N/
265.176 HAS VARIANCE	4.	Are containers holding ignitible or reactive waste located at least 15 meters (50 feet) from the facility's property line?	YES	NO	) M
265.177	5.	If waste in containers is incompatible with other materials stored nearby, are the containers separated from the other materials by means of a dike, berm, wall, or other device?	YES	NO	N/

If yes, fill out tanks checklist except 265.193. Is the date accumulation began clearly marked and visible for inspection on each container?

b. If yes, is waste placed in tanks?

3. Is each containers and tank labeled or marked clearly with the words "Hazardous Waste"?

YES) NO

Note:

If storage period exceeds 90 days then the facility is also a T/S/D facility. If facility is a T/S/D, go to T/S/D checklist here.

Accumulation time requirements:		
Adequate [] Inadequate [] Not Applicable		
If generator is a Kansas generator stop here.  H. Requirements for Generators Operating Unpermitted Storage Facilities (Non T/S/D)  1. Does the owner/operator maintain at the facility, the following documents and records:  a. Job title and job description for each position related to hazardous waste management?  b. Description of type and amount of training to be given each person?  YES		
If generator is a Kansas generator stop here.		
H. Requirements for Generators Operating Unpermitted Storage Facilities (Non T/S/D)	4	
<ol> <li>Does the owner/operator maintain at the facility, the following documents and records:</li> </ol>	Adequate [] Inadequate [] Not Applicable  enerator is a Kansas generator stop here.  H. Requirements for Generators Operating Unpermitted Storage Facilities (Non T/S/D)  1. Does the owner/operator maintain at the facility, the following documents and records:  a. Job title and job description for each position related to hazardous waste management?  b. Description of type and amount of training to be given each person?  c. Records of training given to facility personnel? YES  training requirements:  Adequate [] Inadequate [] Not Applicable  2. The generator who accumulates waste on-site must meet the following requirements of preparedness and prevention (Subpart C):  a. Does an inspection of the facility show any evi-	
		NO
		NO
c. Records of training given to facility personnel?	YES	NO
Personnel training requirements:		
the following requirements of preparedness and pre-	t	
	YES	NO
If generator is a Kansas generator stop here.  H. Requirements for Generators Operating Unpermitted Storage Facilities (Non T/S/D)  1. Does the owner/operator maintain at the facility, the following documents and records:  a. Job title and job description for each position related to hazardous waste management?  b. Description of type and amount of training to be given each person?  c. Records of training given to facility personnel?  Y. Stonnel training requirements:  [] Adequate [] Inadequate [] Not Applicable  2. The generator who accumulates waste on-site must meet the following requirements of preparedness and prevention (Subpart C):  a. Does an inspection of the facility show any evidence of fire, explosion, or contamination?  b. If applicable to the facility, is the facility equipped with:  1. Internal communication or alarm system easily accessible in case of emergency?  2. Telephone, hand-held two-way radio capable		
1. Internal communication or alarm system easily accessible in case of emergency?	The [] Inadequate [] Not Applicable  Or is a Kansas generator stop here.  H. Requirements for Generators Operating Unpermitted Storage Facilities (Non T/S/D)  1. Does the owner/operator maintain at the facility, the following documents and records:  a. Job title and job description for each position related to hazardous waste management?  b. Description of type and amount of training to be given each person?  c. Records of training given to facility personnel? YES Not an applicable  2. The generator who accumulates waste on-site must meet the following requirements of preparedness and prevention (Subpart C):  a. Does an inspection of the facility show any evidence of fire, explosion, or contamination? YES in the facility equipped with:  1. Internal communication or alarm system easily accessible in case of emergency?  2. Telephone, hand-held two-way radio capable	NO
2. Telephone, hand-held two-way radio capable of summoning emergency response personnel?	YES	NO

## OLIN WATER SERVICES

Kansas City, Kansas

Facility operations, waste generation and waste management practices at the Olin facility remain essentially as described in previous inspection reports and their RCRA permit. The facility is minimizing wastes by reusing and reworking material that would otherwise require disposal as hazardous waste.

While inspecting the warehouse area three salvage drums that, according to the generator were empty, were observed. Inspection of the drums revealed that one (1) drum contained material. The drum was opened and a leaking 55 gallon drum discovered. The drum was later identified as biocide that was sent back to the facility for reworking and had apparently been overlooked. The generator indicated this would not happen again and that a better tracking method for "rework" drums would be devised.

Lab wastes are accumulated in safety cans and are picked up by the Safety-Kleen Corporation on a regular basis. Safety-Kleen transfers the contents of the Safety cans to a common container on the date of the pick-up.

Accumulated unused/outdated lab chemicals that were noted on previous inspections were shipped off on June 30, 1988 (See attached copies of manifests).

:gz (sum.ol)

biocide?

poison?

## · STATE OF KANSAS



#### DEPARTMENT OF HEALTH AND ENVIRONMENT

Forbes Field Topeka, Kansas 66620-0001 Phone (913) 296-1500

Mike Hayden, Governor

#### RCRA Compliance Inspection Report

Stanley C. Grant, Ph.D., Secretary Gary K. Hulett, Ph.D., Under Secretary

#### T/S/D Facilities Checklist

Α.	Genera	1

	Date_March 1, 1989	Time_1000 hrs.	EPA ID No. KSD000203638						
	Facility Name Olin Water S	ervices							
	Street_3155 Fiberglass Road								
	City Kansas City	, Kansas Z	ip_66115						
	County_Wyandotte	Phone <u>913-621</u>	-6440						
	Contact William Dame, Plt.	Mgr - Larry Prouty, En	vironmental Affairs Officer						
	Inspector Jim Fischer		·						
	Other Thomas Vittitow and	Rakesh Mohan - Legisla	tive Post Audit Staff						
В.	Activity at Site								
	<u>Treatment</u>	<u>Storage</u>	Disposal						
	Chem/Phys/Bio Treatment	<u>X</u> Drums	Incineration						
	Filtration	Pile	Landfill						
	Incineration	Surface Impoundment	Land						
	Recycling/Recovery	Tank, Above ground	Surface Impoundment						
	Reprocessing	Tank, Below ground	Other (						
	Solvent Recovery	Other ( )							
	Thermal Treatment								
	Volume Reduction								
	Waste Oil								
	Other ( )								

	Commen					
	C.	Waste A	nalysis Pl	an		
265.13			facility at the f	maintain a copy of its waste analysis facility?	YES	NO
		Α.	If yes, c	does the plan include:		
			be ar	meters for which each hazardous waste will halyzed and rationale for the selection of parameters.	(YES)	NO
				methods which are used to test for these meters.	YES	NO
			3. Sampl	ing method used to obtain sample.	YES	NO
			will	dency with which the initial analysis be reviewed or repeated to ensure the vision is current.	YES	NO
.:				off-site facilities, the waste analyses generators have agreed to supply.	YES	NO (NA
			are u of ha match	off-site facilities, the procedures which used to inspect and analyze each movement azardous waste received to ensure that it nes the identity of the waste designated ne manifest.	YES	NO (NA
Waste analysis	pla	ın requir	ements:	*		
[X] Adequa			Inadequate	2		
	D.	Securit	<u>/</u>			
265.14		1. Doe	the faci	ility provide either of the following:		
		a.	A 24-hour or guards	surveillance system? (T.V. monitoring).	YES	NO
		b.	cliff com (attendar	icial or natural barrier ( <u>fence</u> , fence and mbination) <u>and</u> a means to control entry nt, T.V. monitoring, locked entrance, conroadway access).	(YES)	NO

			require	ements?	YES (NO)
Security	requireme	nts:			
M	Adequate		[ ] Inac	dequate [ ] Not Applicable	
	Ε.	Gen	eral Ins	pection Requirements	
265	. 15	1.		ne owner/operator maintain a written schedule facility for inspecting:	
			a. Mor	nitoring equipment	YES) NO
• •			b. Saf	ety and emergency equipment	YES) NO
			c. Sec	curity devices	YES NO
			d. Ope	erating and structural equipment	YES NO
		2.		ne inspection schedule identify the types of ns which are to be looked for during the in- ons?	(YES) NO
		3.	Does th	ne owner/operator maintain an inspection log?	(YES) NO
			a. If	yes, does the log contain the:	
			1.	Date and time of inspection	(YES) NO
			2.	Name of inspector	(YES) NO
			3.	Notation of observations	YES NO
			4.	Date and nature of repairs or remedial action	YES NO
	on require Adequate		s: [ ] Inac	lequate	

Does the facility provide warning signs at entrances.

Does the facility consider itself exempt from security

## F. Personnel Training

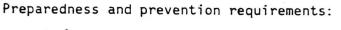
265.16

2.

 Does the owner/operator maintain at the facility, the following documents and records:

	<ul> <li>a. Job title and job description for each position related to hazardous waste management.</li> </ul>	YES	NO	
	<ul> <li>Description of type and amount of training to be given each person.</li> </ul>	YES	NO	
	c. Records of training given to facility personnel.	YES	NO	
Personnel training	requirements:			
[X] Adequate	[ ] Inadequate			
G.	Requirements For Ignitable, Reactive, or Incompatible Wastes	_		
265.17	1. Does the facility handle ignitable or reactive wastes? (	YES	NO	
•	a. If yes, is the waste separated and confined from sources of ignition or reaction, sparks, spon- taneous ignition, and radiant heat?	YES	NO	NA
	<ol><li>Are smoking and open flames confined to specially designated locations?</li></ol>	YES	NO	NA
	3. Are "No Smoking" signs posted in hazard areas?	YES	NO	NA
	4. Does a check of these areas show any leakage or corrosion of containers?	YES (	NO	NA
	5. Does a check of these areas show evidence of heat generation from interaction of incompatible wastes?	YES (	NO	NA
Ignitable, reactiv	e, or incompatible waste requirements:			
[X] Adequate	[ ] Inadequate [ ] Not Applicable			
н.	Preparedness and Prevention			
265.31	<ol> <li>Does an inspection of the facility show any evidence of fire, explosion, or contamination?</li> </ol>	YES (	NO	
265.32	<ol><li>If applicable to the facility, is the facility equipped with:</li></ol>			
	a. Internal communication or alarm system easily accessible in case of emergency?	YES	NO	NA
	b. Telephone, hand-held two-way radio capable of summoning emergency response personnel?	YES	NO	NA

	_			
	3.	Are portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment provided?	YES NO	NA
	4.	Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.?	YES NO	NA
265.33	5.	Is this equipment (1-4 above) tested and maintained to assure its proper operation?	YES NO	NA
265.35	6.	Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment?	YES NO	NA
265.37	7.	If appropriate for the type(s) of waste handled has the owner/operator made arrangements with the local emergency authorities to familiarize them with the layout of facility, properties of wastes handled and associated hazards, places where facility personnel normally work, entrances to roads inside facility, and possible evacuation routes?	YES) NO	NA
	8.	In areas where more than one police and fire department might respond, is there one designated authority?	YES NO	NA
1	9.	If appropriate for the type(s) of waste handled does the owner/operator have agreements with State emergency response teams, emergency response con- tractors, and equipment suppliers?	YES NO	(NA)
	10.	If appropriate for the type(s) of waste handled has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste(s) handled and types of injuries which could result from fires, explosions, or releases at the facility?	YES) NO	NA
	11.	In cases where state or local authorities decline to enter into such arrangements, is the refusal entered in the operating record?	YES NO	(NA
paredness and	l preve	ention requirements:		
Adequat	e 	[ ] Inadequate		



I. Contingency Plan and Emergency Procedures 262.53 Is a contingency plan maintained at the facility and have copies been provided to outside agencies which may be called upon to provide emergency services? 262.52 Does the plan describe arrangements made with emergency

response personnel?

	3.	Does the plan list the name(s), home address, and phone number(s) of the designated emergency coordinator(s)?	YES	NO
265.55	4.	Is an emergency coordinator available at all times?	YES	NO
	5.	Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of its capabilities?	YEQ	NO
	6.	Does the plan include an evacuation plan for facility personnel?	YES	NO
		mergency procedures requirements:		
Adequate	e 	[ ] Inadequate		
J.	. <u>M</u> an	ifest System, Recordkeeping, and Reporting		
265.71	1.	Does the facility receive waste from off-site?	YES (	NO
		a. If yes, does the owner/operator sign and date each copy of the manifest and give a signed copy to the transporter?	YES	NO (NA
**		b. Does the owner/operator send a signed copy of the manifest to the generator within 30 days of the delivery?	YES	NO (NA)
		c. Does the owner/operator retain a copy of manifest?	YES	NO (NA
	2.	Does the facility receive any waste from a rail or water (bulk shipment) transporter?	YES (	NO
		a. If yes, is the shipment accompanied by a shipping paper containing the appropriate information?	YES	NO (NA
		<ol> <li>If yes, does the owner/operator sign and date the shipping paper and provide the transporter with a copy?</li> </ol>	YES	NO (NA)
		<ol><li>Does the owner/operator send a signed copy of the shipping paper to the generator within 30 days of the delivery?</li></ol>	YES	NO (NA)
		3. Does the owner/operator retain a copy of the shipping paper?	YES	NO (NA
365.72	3.	Has the facility received any shipments of waste which were inconsistent with the manifest?	YES	NO (NF

				yes, was an attempt made to reconcile the dis- pancy with the generator and transporter?	YES	NO	(NA)
A w			1.	If no, was the Regional Administrator notified?	YES	NO	(NA)
265.73		4.		ne owner/operator keep a written operating record facility?	YES	·NO	
			a. If	yes, does the operating record include:			
			1.	A description and the quantity of each hazardous waste received, and method(s) and date(s) of its treatment, storage, and disposal?		NO	NA
W 180			2.	The location of each hazardous waste within the facility and the quantity at each location?	YES	NO	NA
			3.	Records and results of waste analyses?	YES	<b>N</b> 0	NA
			4.	Reports and details of incidents requiring implementation of the contingency plan?	YES	NO	NA
			5.	Records and results of required inspections?	YES	NO	NA
			6.	Monitoring, testing, or analytical data?	YES	NO	NA
٠.			7.	Closure cost estimates (and for disposal facilities, post-closure cost estimates)?	YES	NO	NA
265.76		5.	fall un	facility received any waste, which does not der the small generator exclusion, not ac- ed by a manifest or shipping paper?	YES	NO	)
			a. If to	yes, was an unmanifested waste report submitted the Regional Administrator?	YES	<b>N</b> O	NA
fest system	, re	cor	dkeepina	, and reporting requirements:			

Mani

 Adequate [ ] Inadequate

### Closure and Post-Closure

265.112

Does the owner/operator have a written closure plan for the facility?

a. If yes, does the plan include:

1. A description of how and when the facility will be closed?

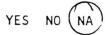
			2.	A description of the steps necessary to completely close the facility?	(YES)	NO	
			3.	An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the facility life?	YES	NO	
			4.	A description of the steps needed to decontaminate facility equipment at the time of closure?	YES	NO	
			5.	An estimate of the expected year of closure and a schedule for final closure which includes the total time required to close the facility and the time required for intervening closure activities which allow tracking closure progress?	(YES)	NO	
	265.118			facility is a disposal facility, does the perator have a written post-closure plan?	YES	NO (N	A
			a. If y	ves, does the plan include:			
			1.	Ground-water monitoring activities and frequencies at which they will be performed?	YES	NO (N	A
	<i>*</i>		2.	Maintenance activities and frequencies at which they will be performed to ensure the integrity of the cap and containment structures where applicable, and the function of the monitoring equipment?	YES	NO (N	A
			3.	The name, address, and phone number of the person or office to contact during the post-closure period?	YES	NO (N	A
Clos	ure and post-c	losur	re requi	rements:			
	X Adequate	[	] Inade	equate			
	L.	Fina	ncial Re	equirements			
	265.142	1.		e owner/operator have a written estimate of sure cost?	YES	NO	
	265.143	2.	surance	owner/operator established financial as- for facility closure and notified the l Administrator? (Required after 7-6-82).	YES	NO	
	265.144	3.	owner/o	facility is a disposal facility, does the perator have a written estimate of the annual post-closure monitoring and maintenance of ility?	YES	NO (N	IA

- 265.145
- 4. Has the owner/operator of the disposal facility established financial assurance for post-closure care and notified the Regional Administrator? (Required after 7-6-82)
- YES NO

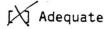


265.147

- 5. Has the owner/operator obtained liability insurance for sudden occurrences of at least \$1 million with an aggregate of at least \$2 million exclusive of legal defense costs? (Effective 7-15-82).
- (YES) N
- 6. If the facility is a disposal facility, has the owner/operator obtained liability insurance for nonsudden and accidental occurrences of at least \$3 million per occurrence with an annual aggregate of at least \$6 million exclusive of legal defense costs? (Effective 7-15-82)



#### Financial requirements:



[ ] Inadequate

#### M. Management of Containers

265.170

- 1. Are containers presently used to store hazardous waste? YES NO
  - If no, do not complete questions 2-5.
  - If yes, check condition of containers and for evidence of incompatibility of waste with containers.

#### Condition of Containers:

Adequate [] Inadequate [] Not Applicable

265.173

2. Are all containers holding hazardous waste closed during storage except when necessary to add or remove waste?

265.174

3. Does owner/operator inspect areas where containers are stored, at least weekly, for signs of leakage and/or deterioration caused by corrosion or other factors?

YES NO NA

HAS V	/ARIANCE			* * * *
	265.176	4.	Are containers holding ignitible or reactive we located at least 15 meters (50 feet) from the property line?	aste facility's YES (NO) NA
	265.177	5.	If waste in containers is incompatible with oth materials stored nearby, in other containers, popen tanks, or surface impoundments, are the conseparated from the other materials by means of berm, wall, or other device?	piles, ontainers
Mai	nagement of (	Containe	`S:	
-	[\] Adequa	ate	] Inadequate [ ] Not Applicable	
	Note:	Determi	ne if owner/operator claims any information con	fidential.
	Note:	(i.e. ta	applicable checklists for specific facility ty anks, surface impoundments, piles, land treatments, groundwater monitoring).	/pes nt,
	Additiona	Informa	ation and CONCLUSIONS	
		=		
		-		
				100 m
	2		.1	
				A
		-		

Form: TSD 4/82

OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2675

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA K S D 0 0 0 2		Manst ocument No.	2. Page 1	required by Fe	the shaded area ederal law, but is	
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16. GENERATOR'S CERTIFICATION: I hereby dec	lare that the contents of this c	onsignment are fully and	d accurately d	escribed above	by	******************	
proper shipping name and are classified, packe according to applicable international and nation	ed, marked, and labeled, and an all government regulations	e in all respects in prope	er condition for	transport by h	ighway		
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20. Facility Owner or Operator: Certification				xcept as note	d in item 19.	Date	е
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PART - 4 TRANSPORTER

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS\*

PART - 3 FACILITY

IN ILLINOIS: 217 / 782-3637

DISTRIBUTION: PART - 1 GENERATOR PART - 2 IEPA



# HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

ease print or type. (Form designed for use on elite	(12-pitch) typewriter.)		MDM/3	∂ Form /	Approved. ON	MB No. 20	50-0039. Expires 9-30-8
UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No.	Manifest Document No-	2. Pag	e 1	is not		the shaded areas red by Federal
3. Generator's Name and Mailing Address	Kabbbbbbbb	2 1 3 3 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4		te Ma	law.	iment :	Number
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9. Designated Facility Name and Site Addre		41499			r's Phone	(3)	z) 396-106 <b>t</b>
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16 GENERATOR'S CERTIFICATION: I hereby	declare that the contents of this consignment	ent are fully and accoun	ataly das	aubad			
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STATE OF KANSAS

DEPARTMENT OF HEALTH AND ENVIRONMENT

Forbes Field Topeka, Kansas 66620-0001 Phone (913) 296-1500

Mike Hayden, Governor

Northwest District Office 2301 East 13th Hays, Kansas 67601 913-625-5663

Stanley C. Grant, Ph.D., Secretary Gary K. Hulett, Ph.D., Under Secretary

April 29, 1988

William E. Dame, Manager Olin Water Services 3155 Fiberglass Road Kansas City, Kansas 66115

RE: Hazardous Waste Compliance Evaluation Inspection EPA Identification Number KSD000203638

MAY 4 1988

K. D. H. E. NORTHEAST DISTRICT

Mr. Dame:

On April 20, 1988 a hazardous waste compliance inspection was conducted at Olin Water Services, 3155 Fiberglass Road, Kansas City, Kansas. This inspection was to determine this facilities compliance with state and federal regulations concerning hazardous waste.

Based on information provided this inspection shows that the facility generates various laboratory and product waste (See supplement A & B), and the amount exceeds 1000 kilograms per month. Generation in excess of 1000 kilograms per month requires compliance with applicable 40CFR Part 262 standards as adopted by K.A.R. 28-31-4. This facility is also a permitted storage facility, subject to the requirements of 40CFR, Parts 260 to 264, 270, 124 and specific conditions of Permit Number KSD000203638.

The current inspection identified the following items not in compliance with state and federal regulations.

- Generators are required to identify all solid wastes and determine if that waste is a hazardous waste as shown in 40CFR 261.2 as adopted by K.A.R. 28-31-4. These standards require the identification of the paint and primer wastes contained in the paint booth filters. Identification shall be completed by June 1, 1988.
- Generators shall keep a copy of each biennial report and exception report for a period of at least three years (40CFR Part 262, Subpart D K.A.R. 28-31-4(f)). The 1985 report was not available for this inspection. Shall be provided for the June 1, 1988 followup.

William E. Dame, Manager Olin Water Services 3155 Fiberglass Road Kansas City, Kansas Page 2.

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- 3. Operators of container storage facilities shall <u>keep</u> all containers marked in accordance with the standards of K.A.R. 28-31-4(9)(2) and (3). Some containers in storage display weathered labels which are becoming difficult to read. These labels shall be replaced.
- 4. A pallet of assorted laboratory chemicals has been packaged and identified as hazardous waste. This waste material is not included in your storage permit, therefore, must be removed before the end of the allowed 90-day storage period. This package was dated 4-4-88 which requires its removal by 7-4-88.

During this inspection the use of a satellite accumulation area was discussed in detail. Following the discussion it was determined that satellite accumulation sites were to be established in the laboratory areas. When implementing this activity you may wish to review the standards for satellite accumulation K.A.R. 28-31-4(j) and the mixed solvent rules of 40CFR, Subpart D 261.31. A review of this paragraph in Mr.Fischer's 1987 report is also recommended.

Thank you for your cooperation and assistance with this inspection. If there are any questions regarding this inspection and the requested corrections, please contact Mr. Fischer or Mr. Ron Smith at 913-296-1604.

Sincerely,

Dale L. Wing

Inspection & Enforcement Section

Bureau of Waste Management

DLW:1r

C: Hazardous Waste

Inspection & Enforcement

Jim Fischer John W. Bosky

File

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CHEMICAL STE MANAGEMENT, INC. Technica ervices Division 4300 West 123rd Street Alsip, Illinois 60658

312/396-1050

INVOICE

THIS IS AN INVOICE FOR CURRENT CHARGES.
PLEASE PAY AMOUNT INDICATED BELOW.

NET DUE UPON RECEIPT

ALL PAST DUE AMOUNTS WILL BEAR INTEREST AT TWO PERCENT PER MONTH OR THE MAXIMUM RATE ALLOWED BY LAW, WHICHEVER IS LESS.

CUSTOMER ACCOUNT NUMBE

768-5010961

INVOICE NUMBER | INVOICE DATE

2023-62354 7-5-88

OLIN CORPORATION 305 SUNSHINE ROAD KANSAS CITY, KS 66115

ATTN: WILLIAM DAME

PURCHASE ORDER # WK 10239 SERVICE CONTRACT SIGNED 6/88

Technical services performed June 29 and 30, 1988.

Classification of waste items into proper DOT hazard class. Packaging of these materials into DCT approved containers. Transportation and disposal of these materials in strict compliance with all DOT and EPA regulations at the below listed disposal facilities.

Disposal by landfill at Emelle, Alabama

1 - 55 gallon drum

Profile Sheet # LAB H64130 Manifest Sheet # CWMA 359220

Disposal by incineration at Sauget, Illinois

12 - 16 gallon drums

5 - 5 gallon drums

Profile Sheet # LAB V90007 Manifest Sheet # IL 2054781 and 2054782

TOTAL PROJECT COST \$8,798.00

REMIT TO ADDRESS

CHEMICAL WASTE MANAGEMENT, INC. Technical Services Division 4300 West 123rd Street Alsip, Illinois 60658

/ply/

PLEASE PAY
THIS AMOUNT

\$8,798.00

CWM Profile No. UAB VIGOROT O. O. D. D. D. O. D. D. D. O. D.	7		P.O. BOX 19276					ı	PC 62 8/81	
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